

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This Document Relates to:

***Town of Bennington; Town of Brattleboro;
and Town of Sharon, Vermont v. Mallinckrodt
PLC, et al, Case No. 1:19-op-45791-DAP
(N.D. Ohio)***

MDL No. 2804

Case No. 17-MD-2804-DAP

Judge Dan Aaron Polster

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

Pursuant to Local Rule 5.2, Plaintiffs seek leave to file Exhibit A to Plaintiffs' Consolidated Motion for Leave From Moratorium On Substantive Filings to: (1) Permit Motion to Sever Non-PBM Defendants from Claims Against PBM Defendants Express Scripts and Optum, and (2) Permit Amendment of their Complaint ("Motion for Leave") under seal.

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents."

Plaintiffs have attached as Exhibit A to their Motion for Leave their proposed Second Amended Complaint.

Plaintiffs' Second Amended Complaint contains information that has been subject to Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendments thereto (ECF #s 441, 1357, 2687, 2688). This information is subject to this Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (ECF # 1813).

Plaintiffs respectfully request to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court's orders.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File their Exhibit Under Seal.

Dated: January 24, 2023

/s/ Joanne M. Cicala

THE CICALA LAW FIRM PLLC

Joanne M. Cicala
Josh Wackerly
R. Johan Conrod, Jr.
Cristina Moreno
Shelbi Flood
101 College Street
Dripping Springs, TX 78620
joanne@cicalapllc.com
johan@cicalapllc.com
josh@cicalapllc.com
cristina@cicalapllc.com
shelbi@cicalapllc.com
Tel.: (512) 275-6550
Fax: (512) 858-1801

SANFORD HEISLER SHARP, LLP

Kevin Sharp
Christine Dunn
ksharp@sanfordheisler.com
cdunn@sanfordheisler.com
611 Commerce Street, Suite 3100
Nashville, Tennessee 37203
Tel: (615) 434-7000
Fax: (615) 434-7020

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record at their e-mail addresses on file with the Court.

/s/ Joanne M. Cicala

Joanne M. Cicala